

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMY BARTOLETTI, CHIA SIU,
NADINE MENTOR, LISA CONLEY and
BRITTANY SHARPTON,

Plaintiffs,

v.

CITIGROUP INC. and CITIGROUP
GLOBAL MARKETS, INC.,

Defendants.

No. 1:10-cv-7820 (LGS)

ORAL ARGUMENT REQUESTED

DEFENDANTS' NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Defendants Citigroup, Inc. ("Citigroup") and Citigroup Global Markets, Inc. ("CGMI" or "the Company") (collectively "Defendants"), pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York and the Individual Rules of this Court, and upon: (1) the accompanying Memorandum of Law in Support of Defendants' Motion for Summary Judgment; (2) Defendants' Rule 56.1 Statement of Undisputed Material Facts in Support of their Motion for Summary Judgment; (3) the Declaration of Frank Chin; and (4) the Declaration of Leni D. Battaglia, and the exhibits attached thereto, will move this Court, before the Honorable Lorna G. Schofield, U.S.D.J., in the United States District Court, at the United States District Courthouse for the Southern District of New York, 40 Foley Square, Courtroom 1106, New York, NY 10007, on a date and time to be designated by the Court, for an Order: (i) granting summary judgment in favor of Defendants on Plaintiffs' claims and dismissing Plaintiffs' Complaint in its entirety and with prejudice; and (ii) granting Defendants such other and further relief as this Court deems just and proper.

MOTION

Plaintiffs Amy Bartoletti, Lisa Conley, Nadine Mentor, Brittany Sharpton and Chia Siu gave filed an action against Defendants alleging claims of gender discrimination in violation of 42 U.S.C. §§ 2000e et seq. (“Title VII”), the New York State Human Rights Law, N.Y. Executive Law §§ 290 et seq. (“NYSHRL”), and the New York City Human Rights Law, New York City Administrative Code §§ 8-101 et seq. (“NYCHRL”). Defendants move for summary judgment on all claims contained in the Complaint because Plaintiffs has failed to raise a genuine issue of material fact requiring trial and because Defendants are entitled to summary judgment as a matter of law.

Dated: New York, New York

June 7, 2013

By: /s/ Kenneth J. Turnbull
Kenneth Turnbull
Leni D. Battaglia
MORGAN, LEWIS & BOCKIUS LLP
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Leni D. Battaglia, hereby certify that on this 7th day of June 2013, I caused to be served true and correct copies of Defendants' Notice of Motion and Motion for Summary Judgment, Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment, Defendants' Rule 56.1 Statement of Undisputed Material Facts in Support of Their Motion for Summary Judgment, the Declaration of Francis Y. Chin, and the Declaration of Leni D. Battaglia, and the exhibits attached thereto, via ECF upon the following:

Douglas Holden Wigdor
Kenneth P. Thompson
David Evan Gottlieb
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Counsel for Plaintiffs

/s/Leni D. Battaglia
Leni D. Battaglia